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NSB KINGS BAY
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SEMI-ANNUAL CORRECTIVE ACTION REPORT FOR SITE 11 OCTOBER 2005 - MARCH
2006 WITH TRANSMITTAL LETTER NSB KINGS BAY GA
4/27/2006
VT GROUP



March 15, 1995
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Commanding Officer
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
North Charleston, SC 29418

Attention: Anthony Robinson
Code 18511

Subject: Revisions to April, 1995 Groundwater Sampling Event

Reference: NSB Kings Bay, Georgia
Contract Task Order 094
Prime Contract Number N62467-89-D-0317

Dear Mr. Robinson:

At your request, we have reviewed our sampling and analysis program scheduled for April, 1995, to identify areas where cost savings may be made as long as technical data and information are not sacrificed. Because this sampling program is not regulated by GEPA, nor was it ever part of a compliance monitoring program, we feel that adjustments to the program are appropriate at this time. However, the issue of compliance monitoring needs to be raised with GEPA in our planned meeting with the state because these programs are required under RCRA and we are uncertain why GEPA has made no mention of such a program. This monitoring issue is "Topic 8" mentioned in my letter to you dated March 13, 1995.

The following summarizes our proposed revisions to the analytical program for the April 1995 groundwater sampling event at Site 11, Old Camden County Landfill, located at Naval Submarine Base, Kings Bay, Georgia. The revised analytical program was developed based on current information needs. Other revisions may be appropriate in the future. This revision also incorporates additional data needs and sampling points to support the *in situ* bio-technology study.

First and foremost, we have decided that the project would benefit by changing the laboratory used for analyses. As you are aware, we had considerable data-package quality and service quality issues that caused an 8-week delay in receiving the laboratory data from the trenching program. Because the laboratory (Quanterra) was relatively uncooperative in resolving the issues during the validation process, and did not convince us that problems would be fixed for future sampling events, we decided a change was needed. Although we are always concerned with data consistency issues when changes in laboratories are made, we had lengthy discussions with CLEAN's Technical Services Manager who supported our decision to change laboratories and that data consistency should not suffer from such a change. Ted Taylor will be calling you on this issue on March 16 when you return to receive your input and concurrence.

Table 1 is a list of the parameters and corresponding monitoring wells that will be sampled in April 1995. Two monitoring wells, KBA-11-19A and KBA-11-22A, will not be sampled. These wells are co-located with deeper wells and previous analytical data do not indicate trends in water chemistry that need continued monitoring.

ABB Environmental Services, Inc.

Mr. Anthony Robinson
Code 18511
March 15, 1995
Page 2

Volatile organic compound (VOC) analyses will be deleted from the April 1995 analytical program at 10 sampling locations. VOCs will be kept in the analytical program at locations that are instrumental in monitoring vertical or horizontal migration of the plume. VOCs will be kept in the analytical program at locations where data from co-located wells indicate trends in water chemistry. At other locations VOCs will be deleted from the program if adjacent locations provided adequate monitoring of plume migration, or if historical data and location of the well in relation to plume movement indicate the frequency of VOC monitoring can be scaled back.

Semivolatile organic compound (SVOC) analyses will be deleted from the April 1995 analytical program for 13 monitoring wells. Locations where SVOC analyses will be deleted include those locations where SVOCs have not been detected in past sampling rounds, or were detected at concentrations below the quantitation limit and are not needed to monitor plume movement. Other locations where SVOCs will be deleted from the program are areas where adjacent wells provide adequate monitoring. SVOCs will not be deleted from the program at locations that are instrumental for monitoring plume movement or that are needed to evaluate concentrations of phthalate compounds detected in samples from previous sampling events. In the past, detections of bis(2-ethylhexyl)phthalate at concentrations above the maximum contaminant level (MCL) were observed at several locations. The detections have been inconsistent and are suspected of being artifacts of sampling or analytical procedures.

Pesticide analyses were reduced in the analytical program following completion of the April 1994 sampling event. However, five monitoring wells continue to be sampled for pesticide analyses because of previous positive detections which have all been below MCL's. The pesticide data from the past two sampling events (both performed by Quanterra) have indicated positive detections, but the type of pesticide reported with the detection has been inconsistent. In addition, pesticides have only been detected by Quanterra: when analyses were performed by QAL, pesticides were not detected. ABB-ES is in the process of requesting MDL studies and chromatograms to investigate this pesticide issue. In addition, our recommended change in laboratories for the April 1995 event may assist us with the determination of whether pesticides are truly present.

Inorganic analyses will not be scaled back, with the exception of the two monitoring wells that will not be sampled during April 1995. The inorganic data are needed for the database that will be used to evaluate potential inorganic contaminants at the site, and to assess background.

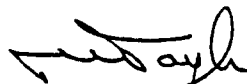
If you have any questions or need additional information please call Ted Taylor or me.

Sincerely,

ABB ENVIRONMENTAL SERVICES, INC.



Laura B. Harris, P.G.
RFI Technical Lead



Theodore W. Taylor, P.G.
Task Order Manager

attachment

pc: Sandi Mukherjee

TABLE 1
NAVAL SUBMARINE BASE KINGS BAY GEORGIA
APRIL 1995 GROUNDWATER SAMPLING EVENT

STATION LOCATION KBA-11-	CLP VOC	CLP SVL C	CLP PEST/PCB	INORGANICS (METALS, SULFIDES)	BIO-TECHNOLOGY PARAMETERS
6	XDM	XDM		XDM	
7				X	
11A				X	
11B		X		X	X
11C	X	X	XM	X	
8A				X	
8C	X	X		X	
4				X	
1				X	
9			X	X	
14	X		X	X	X
12	X			X	X
15	X	X		X	X
18	X	X		X	
20	X			XD	X
5				X	
17A				X	
17C	X	X		X	
3C	X	X		X	
19A	OMIT			OMIT	
13B	X	X		X	
10C	X	X		X	
21	X	X		X	X
19B	X	X		X	X
8B	X	X		X	X
22A	OMIT			OMIT	X
2	X			X	X
3A	X	X		X	X
17B	XD	XD		XDM	X
10A				X	X
13A	X	X		X	XD
22B	X	X	XD	X	X
10B	X	X	X	X	X
16	X	X		X	X
PS-1	X	X		X	X
3B	XDM	XDM		XD	XD

NOTES: 1) SAMPLES FROM ALL FIVE RECOVERY WELLS (RW-1, RW-2, RW-3, RW-4, RW-5) WILL ALSO BE COLLECTED AND ANALYZED FOR BIO-TECHNOLOGY PARAMETERS.

LEGEND: X - REGULAR SAMPLE
D - DUPLICATE SAMPLE
M - MATRIX SPIKE / MATRIX SPIKE DUPLICATE (MS/MSD)